

June 4, 2010

Via Electronic Mail

Ms. Susan M. Hudson, Clerk
Vermont Public Service Board
Chittenden Bank Building, Fourth Floor
112 State Street, Drawer 20
Montpelier, VT 05620-2701

RE: PSB Rule 5.500 – Interconnection Requirements – Draft Model Documents

Dear Ms. Hudson:

Pursuant to the May 14, 2010 email from Ms. Mary-Jo Krolewski to the service list, the Interstate Renewable Energy Council (IREC) hereby submits this reply to the comments on the Draft Model Agreements offered by comment by parties to the service list on May 22, 2010.

DISCUSSION

IREC continues to be concerned with the proposal to impose a term of years for interconnection agreements as currently proposed in the draft interconnection agreement. However, IREC also appreciates the concerns raised by stakeholders concerning an “evergreen” interconnection agreement. Moreover, as Central Vermont Public Service (CVPS) notes, the New England ISO (NE-ISO) Small Generator Interconnection Agreement currently requires a term of years to be specified in article 3.2. That article states:

3.2. Term of Agreement

This Agreement shall become effective on the Effective Date and by mutual agreement of the Parties shall remain in effect for a period of _____ years, (*Term to be specified in individual Agreements, but in no case should the term be less than ten years from the Effective Date or such other longer period as the Interconnection Customer may request*) and shall be automatically renewed for each successive one-year period thereafter, unless terminated earlier in accordance with article 3.3 of this Agreement. [Italics in original]

IREC would support using this language for any term of years contained in Vermont’s model interconnection agreement. The above language should address stakeholders’ concerns with avoiding an evergreen interconnection agreement while also addressing IREC’s concerns as it provides for a mutual agreement between parties on the term of years to be contained in the interconnection agreement. Adoption of the above language (with the slight modification suggested below) will also provide the exact same terms and conditions related to the length of

an interconnection agreement as available for interconnections subject to the jurisdiction of the NE-ISO. The only change that would need to be made to the above language to comport with the current model interconnection agreement would be to reference “article 5.1” rather than “article 3.3” in the last sentence.

CONCLUSION

IREC appreciates the opportunity to submit these stakeholders’ comments in response to the Draft Documents submitted by CVPS on May 17, 2010. IREC appreciates all of the efforts of stakeholders to date to develop these model documents and also efforts to date to update Rule 5.500 in a cooperative fashion. This process has been very constructive and IREC continues to believe it will result in interconnection standards and documents in Vermont that will be models for the many other states.

Respectfully,

/s/ Joseph F. Wiedman

For the Interstate Renewable Energy
Council

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cc: Electronic Service List